

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

| | | |
|---------------------------------|---|-----------------------------------|
| UNITED STATES OF AMERICA | : | |
| Plaintiff, | : | Case No: 2:23-CR-188 |
| v. | : | |
| | : | CHIEF JUDGE SARAH MORRISON |
| | : | |
| JOSEPH WILLIAMS, | : | |
| Defendant. | : | |

MOTION TO CONTINUE SENTENCING

Now come the Defendant, Stephen Chinn, by and through undersigned counsel, and respectfully requests that the Court continue the Sentencing in this matter, currently scheduled for March 18, 2025.

Counsel for the Defendant is requesting this continuance because he needs time to work out some certain information and discuss other aspects of the case with Mr. Chinn (located in Youngstown, Ohio) and his family in preparation of Sentencing.

Counsel for the Government, AUSA Emily Czerniejewski, is not opposed to this motion.

Respectfully submitted,

/s/ Larry W. Thomas
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Columbus, Ohio 43203
(614) 252-8788
Attorney for Defendant

CERTIFICATE OF SERVICE

A true copy of the foregoing Motion for Continuance was electronically filed and served on all parties this 6 March 6, 2025.

/s/Larry W. Thomas
Larry W. Thomas